

KIRBY McINERNEY LLP
Roger W. Kirby
Peter S. Linden
Ira M. Press
830 Third Avenue, 10th Floor
New York, NY 10022
(212) 371-6600

Attorneys for Movant, the ATD Group

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

TILLIE SALTZMAN, Individually and On Behalf of
All Others Similarly Situated,

Plaintiff,

v.

CITIGROUP INC., CHARLES O. PRINCE,
ROBERT E. RUBIN, STEPHEN R. VOLK, SALLIE
L. KRAWCHECK, GARY L. CRITTENDEN and
ROBERT DRUSKIN,

Defendants.

Civil Action No.
07 CIV 9901 (SHS)

LENNARD HAMMERSCHLAG, Individually and
On Behalf of All Others Similarly Situated,

Plaintiff,

v.

CITIGROUP INC., CHARLES PRINCE, SALLIE
KRAWCHECK, and GARY CRITTENDEN,

Defendants.

No. 07 CIV 10258 (SHS)

**NOTICE OF MOTION OF THE ATD GROUP TO CONSOLIDATE RELATED
ACTIONS, APPOINT LEAD PLAINTIFF AND APPROVE LEAD PLAINTIFF
AND APPROVE LEAD PLAINTIFF'S SELECTION OF LEAD COUNSEL**

TO ALL PARTIES AND THEIR RESPECTIVE ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that, Edward and Elaine Altman, Jonathan Butler, M. David Diamond, and David and Henrietta Whitcomb (collectively the “ATD Group”) hereby move this Court before The Honorable Sidney H. Stein, Courtroom 23A, United States Courthouse, 500 Pearl Street, New York, NY 10007, under Fed R. Civ. P. 42 and §21(D) et seq. of the Securities Exchange Act of 1934, as amended by the Private Securities Litigation Reform Act of 1995 (the “PSLRA”), for an order (i) consolidating the above-captioned related actions, (ii) appointing the ATD Group as Lead Plaintiff; and (iii) approving Lead Plaintiff’s selection of Kirby McInerney LLP as Plaintiff’s Lead Counsel for the Class.

This motion is brought pursuant to the Securities Exchange Act of 1934 as amended by the PSLRA.

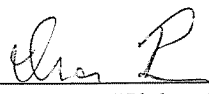
This motion is made on the ground that good cause exists for the granting of the Order sought. This motion is based on this notice, the accompanying memorandum of laws, Affidavit of Ira M. Press, and the Court's complete files and records in the above-

captioned actions, as well as such further argument as the Court may allow at the hearing on this motion.

Dated: January 7, 2008

Respectfully submitted,

KIRBY McINERNEY LLP

By: 

Roger W. Kirby (RK 4503)
Peter S. Linden (PL 8945)
Ira M. Press (IP 5313)
830 Third Avenue, 10th Floor
New York, NY 10022
Tel: (212) 371-6600

ALLEN BROTHERS, P.L.L.C.

Kenneth Gold
James Allen, Sr.
400 Monroe, Suite 220
Detroit, MI 48226
Tel: (313) 962-7777

Attorneys for Movant, The ATD Group